NSPS OOOO/OOOOa vs.U&O FIP

Purpose of this background

Understand current NSPS OOOOa requirements being considered in revising the rule and how this reconsideration may affect our efforts in the Uinta Basin. NSPS OOOOa covers new well facilities; UDAQ covers new and existing; and the U&O FIP will cover existing facilities while extending coverage for new facilities under the EPA National Tribal O&G FIP.

Below is a list of emission sources accounted for in the Uinta Basin 2014 Oil & Gas Emission Inventory showing VOC emissions and coverage of that emission source under NSPS OOOO/OOOOa; UDAQ's oil and gas rules (in-place and proposed) or permits; and EPA Region 8's U&O FIP (underway):

Uinta Basin 2014 O&G Emission Inventory - Indian country

Emission Source	VOC (TPY)	NSPS OOOO/ OOOOa	UDAQ	U&O FIP
Wastewater Ponds	23,770		YES (by permit)	
Fugitives	13,901	YES	YES	YES
Pneumatic Pumps	11,133	YES	YES	YES
Tanks	9,039	YES	YES	YES
Pneumatic Controllers	4,193	YES	YES	YES
Dehydrators	3,872		YES	YES
Oil Exploration: Mud Degassing	1,601			
RICE&Engines	1,177		YES	
Venting - Compressor Startup	915			
Truck Loading	885		YES	
Venting - Compressor Shutdown	867			
Well Completions (Drilling)	661	YES		
Venting - blowdowns	324			
Solid Waste Disposal	206			
Separators&Heaters	109			
Gas Exploration: Mud Degassing	95			
Venting - initial completions	79	YES		
Venting - recompletions	12			
Gas Plant Truck Loading	3			
TOTAL	**72,843**			

Wastewater ponds – NSPS OOOOa does not cover and we need to learn more about the wastewater ponds handling produced water on Indian country. We are considering seeking comment on this emission source in our U&O FIP. Another alternative would be to send information requests directly to each facility.

Fugitives – NSPS OOOOa is evaluating an exemption from monitoring (looking for gas emissions) on low production wells and oil wells. There have been over a dozen peer-reviewed research papers presenting data on the presence of "super-emitters", emissions from a small number of sources accounting for a

large overall percentage of those emissions. Abnormal process conditions are typically the cause, so whether a low producing well (many wells in Uinta Basin) or an oil well (about half the wells in Uinta Basin). A common malfunction that can occur at a wellpad facility is a stuck-open dump valve from the separator to the tanks, so whether an oil well or gas well, high-producing or low-producing, this can occur resulting in significant emissions from the tank vent as gas streams through the stuck-open valve.